SECTION III—REMARKS

This amendment is submitted in response to the Office Action mailed May 3, 2004, which action the Examiner made final. No claims are amended herein, and claims 1-30 and 34-36 remain pending in the application. Applicants respectfully request allowance of all pending claims in view of the above amendments and the following remarks.

Rejections Under 35 U.S.C. § 103

The Examiner rejected claims 1-7 and 9-36 under 35 U.S.C § 103(a) as obvious in view of, and therefore unpatentable over, U.S. Patent No. 6,081,900 to Subramaniam et al ("Subramaniam") and U.S. Patent No. 6,502,135 to Munger et al ("Munger"). Additionally, the Examiner rejected claim 8 as obvious in view of Subramaniam and Munger and further in view of U.S. Patent No. 6,502,106 to Gampper et al ("Gampper").

Applicants respectfully traverse the Examiner's rejections. To establish a *prima facie* case of obviousness, three criteria must be met: (1) the prior art references must teach or suggest all the claim limitations; (2) some suggestion or motivation to combine the references must be found in the prior art; and (3) there must be a reasonable expectation of success. MPEP § 2143. As explained below, the Examiner has not established a *prima facie* case of obviousness because criteria (1) and (2) have not been met.

Claim 1 recites a method combination including "receiving a request including an address, the address comprising an address of a secure server with an address of a web page concatenated thereto, and the address being at least partially encrypted." Contrary to the Examiner's allegation, Subramaniam does not disclose, teach or suggest a combination including the recited limitation. Subramaniam discloses sending a standard HTTP re-direct command <u>from</u> the target server 104 directly <u>to</u> the client 112. Subramaniam does not disclose that a re-direct is ever <u>sent by</u> the client 112 or <u>received by</u> the border server 106, and therefore cannot disclose, teach or suggest "receiving a request including an address, the address comprising an address of a secure server with an address of a web page concatenated thereto, and the address being at least partially encrypted." Munger also does not disclose a combination with the claimed limitation. Munger discloses the encryption of IP packets, but does not disclose an address having the recited limitations. Subramaniam and Munger, taken together, therefore cannot disclose, teach or suggest every limitation recited in the claim.

Even if, for the sake of argument, Subramaniam and Munger did teach every element and limitation recited in the claim, they would still not obviate the claimed combination. If a proposed modification would render the prior art invention being modified unsuitable for its intended purpose, then there is no suggestion or motivation to make the proposed modification. MPEP § 2143.01; *In re Gordon*, 733 F.2d 900 (Fed. Cir. 1984). In Subramaniam, if any part of the address in the re-direct command sent to the client 112 were encrypted as taught by Munger, the client 112 would be unable to identify the server to which it is being re-directed and the re-direct would fail, thereby leaving the client 112 with no access to the target server and thwarting the whole operation of Subramaniam. For the above reasons, Applicants respectfully submit that claim 1 is in condition for allowance, and respectfully request withdrawal of the rejection and allowance of the claim.

Claim 16 recites a method combination including providing an intermediate unit to receive a request for a web page from a terminal, "the request including an address comprising an address of a secure server with an address of a web page concatenated thereto, and the address being at least partially encrypted." As discussed above in connection with claim 1, Subramaniam and Munger do not disclose, teach or suggest this limitation and provide no motivation for the combination attempted by the Examiner. Applicants submit that claim 16 is therefore in condition for allowance and respectfully request withdrawal of the rejection and allowance of the claim.

Claim 20 recites a machine-readable medium having stored thereon instructions, which when executed by a processor, cause the processor to, among other things, "receive a request including an address, the address comprising an address of a secure server with an address of a web page concatenated thereto, and the address being at least partially encrypted." As discussed above in connection with claim 1, Subramaniam and Munger do not disclose, teach or suggest this limitation and provide no motivation for the combination attempted by the Examiner. Applicants submit that claim 20 is therefore in condition for allowance and respectfully request withdrawal of the rejection and allowance of the claim.

Claim 24 recites a machine-readable medium having stored thereon instructions, which when executed by a processor, cause the processor to, among other things, "receive a request for a web page from a terminal, the request including an address, the address comprising an address

of a secure server with an address of a web page concatenated thereto, and the address being at least partially encrypted." As discussed above in connection with claim 1, Subramaniam and Munger do not disclose, teach or suggest this limitation and provide no motivation for the combination attempted by the Examiner. Applicants submit that claim 24 is therefore in condition for allowance and respectfully request withdrawal of the rejection and allowance of the claim.

Claim 28 recites an apparatus combination including a processor and a communication unit, wherein the processor and the communication unit carry out certain functions "responsive to a request from the terminal including an address comprising an address of a secure server with an address of a web page concatenated thereto, the address being at least partially encrypted." As discussed above in connection with claim 1, Subramaniam and Munger do not disclose, teach or suggest this limitation and provide no motivation for the combination attempted by the Examiner. Applicants submit that claim 28 is therefore in condition for allowance and respectfully request withdrawal of the rejection and allowance of the claim.

Claim 34 recites an apparatus combination including a server and an intermediate unit, wherein the server carries out certain functions "in response to a request received from the terminal, the request including an address comprising an address of a secure server with an address of a web page concatenated thereto, the address being at least partially encrypted." As discussed above in connection with claim 1, Subramaniam and Munger do not disclose, teach or suggest this limitation and provide no motivation for the combination attempted by the Examiner. Applicants submit that claim 34 is therefore in condition for allowance and respectfully request withdrawal of the rejection and allowance of the claim.

Regarding claims 2-15, 17-19, 21-23, 25-27, 29-30 and 35-36, if an independent claim is non-obvious under 35 U.S.C. § 103, then any claim depending therefrom is also non-obvious. MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, claims 1, 16, 20, 24, 28 and 34 are in condition for allowance. Applicants submit that claims 2-15, 17-19, 21-23, 25-27, 29-30 and 35-36 are therefore allowable by virtue of their dependence on allowable independent claims, as well as by virtue of the features recited therein. Applicants therefore respectfully request withdrawal of the rejections and allowance of these claims.

Conclusion

Given the above amendments and accompanying remarks, all claims pending in the application are in condition for allowance. If the undersigned attorney has overlooked a teaching in any of the cited references that is relevant to allowance of the claims, the Examiner is requested to specifically point out where such teaching may be found. Further, if there are any informalities or questions that can be addressed via telephone, the Examiner is encouraged to contact the undersigned attorney at (206) 292-8600.

Charge Deposit Account

Please charge our Deposit Account No. 02-2666 for any additional fee(s) that may be due in this matter, and please credit the same deposit account for any overpayment.

Respectfully submitted,

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Date: 9-2-04

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Enclosures: Amendment transmittal, in duplicate
               Petition for one-month extension, in duplicate